

**M-11-891**

EAG:MKM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C., §§ 952(a)  
and 960)

LUDY CEPEDA,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER CHEN, being duly sworn, deposes and says that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about September 1, 2011, within the Eastern District of New York and elsewhere, the defendant LUDY CEPEDA did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. On or about September 1, 2011, the defendant LUDY CEPEDA arrived at JFK International Airport ("JFK") in Queens, New York aboard Jet Blue flight no. 856 from Santo Domingo, Dominican Republic.

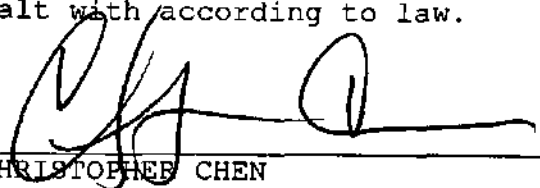
2. The defendant LUDY CEPEDA was selected for a Customs and Border Protection ("CBP") examination of her luggage. During that inspection, she presented two "Gabbiano" roller bags. When asked if the bags and everything in them belonged to her, the defendant responded "Yes."

3. During the CBP examination of her two bags, the defendant LUDY CEPEDA avoided eye contact and fidgeted nervously. A probe of the handrails of each the bags revealed a white powdery substance, which field-tested positive for the presence of cocaine. The total approximate gross weight of the white powdery substance recovered from the defendant LUDY CEPEDA's two bags was 2,729.5 grams.

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<sup>1/</sup> Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

3. WHEREFORE, your deponent respectfully requests that the defendant LUDY CEPEDA be dealt with according to law.

  
\_\_\_\_\_  
CHRISTOPHER CHEN  
Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
2nd day of September, 2011.

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HONORABLE MARILYN D. GO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK